201-15547 American

Chemistry

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COURTNEY M. PRICE VICE PRESIDENT CHEMSTAR

August 24, 2004

UP TO COOM NO

Michael O. Leavitt, Administrator U.S. Environmental Protection Agency P.O. Box 1473 Merrifield, VA 22116 ATTN: Chemical Right-To-Know Program

Re: Revised Polyol Esters Category Test Plan and New Member for Aliphatic Esters Panel, HPV Consortium

Dear Administrator Leavitt:

The American Chemistry Council's Aliphatic Esters Panel (Panel) is pleased to submit for review the revised Polyol Esters Category Test Plan. This revised Test Plan incorporates suggestions made during the public comment process for the Panel's original Category Test Plan, which was submitted on December 20, 2001. Additional information is available in the Panel's November 14, 2003, letter to EPA (attached).

The Panel carefully considered EPA's and other comments on the original Category Test Plan and, as a result, decided to develop five separate Category Test Plans. The Panel also enhanced the technical discussion of data for category members and surrogate chemicals, clarified the presentation of robust summaries, and incorporated new information collected since the original Test Plan was submitted.

Reichhold, Inc., is now a member of the Panel, and will complete its sponsorship of two Aliphatic Esters HPV chemicals through the Panel.

Please return comments or questions regarding this Test Plan to John Morris, the Aliphatic Esters Panel Manager, at john morris@americanchemistry.com or (703) 741-5631.

Sincerely yours,

Attachments

cc with attachments:

Wardner Penberthy, EPA Oscar Hernandez, EPA Aliphatic Esters Panel Richard Sedlak, SDA Jim Keith, ACC



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